

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	:	Chapter 11
	:	
Center City Healthcare, LLC d/b/a Hahnemann	:	
University Hospital, <i>et al.</i> ,	:	Case No. 19-11466 (MFW)
	:	
Debtors.	:	Jointly Administered
	:	

Center City Healthcare, LLC d/b/a Hahnemann	:	
University Hospital, Philadelphia Academic Health	:	
System, LLC, St. Christopher's Healthcare, LLC,	:	
Philadelphia Academic Medical Associates, LLC,	:	
HPS of PA, L.L.C., SCHC Pediatric Associates,	:	
L.L.C., St. Christopher's Pediatric Urgent Care	:	
Center, L.L.C., SCHC Pediatric Anesthesia	:	
Associates, L.L.C., StChris Care at Northeast	:	
Pediatrics, L.L.C., TPS of PA, L.L.C., TPS II of PA,	:	
L.L.C., TPS III of PA, L.L.C., TPS IV of PA, L.L.C.	:	
and TPS V of PA, L.L.C.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Adv. Pro. No. 21-50912 (MFW)
	:	
HRE Capital, LLC f/k/a Healthcare Real Estate	:	
Capital, LLC,	:	
	:	
Defendant.	:	Re: Docket No. 9

AGREED PRE-TRIAL SCHEDULING ORDER

The above-captioned plaintiffs in this adversary proceeding (the “**Plaintiffs**”) and HRE Capital, LLC f/k/a Healthcare Real Estate Capital, LLC (“**HRE Capital**” and together with Plaintiffs, collectively, the “**Parties**”), having held the discovery planning conference described in Fed.R.Civ.P. 26(f), made applicable in this adversary proceeding by Fed.R.Bankr.P. 7026, have agreed to the following dates and deadlines for this adversary proceeding:

1. The parties shall provide the initial disclosures required by Fed.R.Civ.P. 26(a)(1) no later than fourteen (14) days after the pre-trial conference in this adversary proceeding scheduled for March 8, 2022.

2. All fact discovery shall be initiated consistent with applicable rules of procedure so that fact discovery including depositions of fact witnesses are completed by June 15, 2022.

3. The parties shall provide expert reports for any issue on which they bear the burden of proof by July 15, 2022. Any expert report by any of the Parties intended to rebut any other expert report shall be provided by August 1, 2022. All reports shall provide the information required by Fed.R.Civ.P. 26(a)(2)(B).

4. All expert discovery shall be completed by, and discovery shall close on, September 1, 2022.

5. All dispositive motions shall be filed and served by September 30, 2022 and shall be subject to Rule 7.1.2 of the Local Rules of Civil Practice and Procedure of the United States District Court for the District of Delaware.

6. Following submission of dispositive motions, or the lapse of the deadline set forth in Paragraph 5 above with no dispositive motions having been filed, the Parties may contact the Court to schedule a status conference to discuss, among other things, the scheduling of a pre-trial conference and trial.

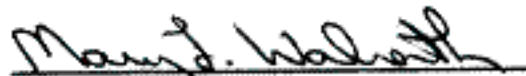
7. The Parties may modify the deadlines set forth herein by (i) mutual agreement (other than with respect to hearing dates, which shall be subject to the Court's availability) or (ii) upon request and further order from the Court, which request may be granted for good cause. The Parties agree to act in good faith in discussing any extension to any deadline.

8. The Parties agree that service by e-mail on all other Parties of discovery requests and written responses is sufficient.

9. This terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

10. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and/or enforcement of this Order.

Dated: March 4th, 2022
Wilmington, Delaware



MARY F. WALRATH

3 UNITED STATES BANKRUPTCY JUDGE